

# EXHIBIT 15

1 UNITED STATES DISTRICT COURT FOR THE  
2 SOUTHERN DISTRICT OF NEW YORK  
3 - - -  
4 GOVERNMENT OF THE UNITED : Case Number:  
5 STATES VIRGIN ISLANDS : 1:22-cv-  
6 Plaintiff, : 10904-JSR  
7 v. :  
8 JPMORGAN CHASE BANK, N.A. :  
9 Defendant/Third-Party :  
Plaintiff. :  

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JPMORGAN CHASE BANK, N.A. :  
Third-Party Plaintiff, :  
v. :  
JAMES EDWARD STALEY :  
Third-Party Defendant. :  
10 - - -  
11 MAY 24, 2023  
12 HIGHLY CONFIDENTIAL  
13 - - -  
14 Videotaped deposition of  
15 STEPHEN CUTLER, taken pursuant to notice,  
16 was held at the law offices of Boies  
17 Schiller Flexner LLP, 55 Hudson Yards,  
18 New York, New York, commencing at  
19 9:40 a.m., on the above date, before  
20 Amanda Dee Maslynsky-Miller, a Certified  
21 Realtime Reporter and Notary Public in  
22 and for the State of New York.  
23 - - -  
24 GOLKOW LITIGATION SERVICES, INC.  
877.370.3377 ph| 917.591.5672 fax  
deps@golkow.com

4 A. I believe so.

5 Q. He represented Epstein in  
6 state plea/fed NPA process.

7 Do you see that?

8                   A.           I do.

9                   Q.       He said that he and Epstein  
10          have heard nothing to suggest that  
11          there's a current FBI or other law  
12          enforcement agency investigation,  
13          believes any pre-plea conduct is subsumed  
14          within plea NPA. Acknowledges that there  
15          could be a current investigation he  
16          doesn't know about, but doesn't think  
17          likely.

18 Do you see that?

19 A. I do.

20 Q. So Jay Lefkowitz did not  
21 confirm to you, one way or the other,  
22 whether or not there was an  
23 investigation, just that he, at least,  
24 stated to Jonathan Schwartz he was not

1 aware, correct?

2 A. I read this to have him say  
3 neither he nor his client is aware of  
4 such an investigation. That doesn't  
5 definitively mean that there wasn't.

6 Q. And at the SEC when you were  
7 investigating potential wrongdoers, you  
8 would not necessarily make it publicly  
9 known or known to the potential target  
10 that you were investigating them,  
11 correct?

12 A. I would say most of the time  
13 targets would know. But, sure, there  
14 would be occasions where the target would  
15 not know.

16 Q. Or there would be  
17 potentially part -- during part of the  
18 investigation where the target wouldn't  
19 know yet, and then at some point later in  
20 the investigation you might, for example,  
21 issue a Wells notice, correct?

22 A. Yeah, you would -- if -- I  
23 don't mean to quarrel with you, but you  
24 would likely have heard of an